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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SIGNIFY NORTH AMERICA
CORPORATION and
SIGNIFY HOLDING B.V.,

Plaintiffs,

vs.

LEPRO INNOVATION INC.,
LE INNOVATION INC.,
INNOVATION RULES INC.,
HOME EVER INC., and
LETIANLIGHTING, INC.,

Defendants.

Civil No. 2:22-cv-02095-JAD-DJA

**JOINT STIPULATION AND ORDER
TO (1) SET A DEADLINE OF
FEBRUARY 27, 2023 FOR ALL
DEFENDANTS TO ANSWER, (2) SET
ASIDE ENTRY OF DEFAULT AS TO
DEFAULTED DEFENDANTS, AND (3)
WITHDRAW PLAINTIFFS' MOTION
FOR LEAVE TO SERVE
DEFENDANT LE INNOVATION INC.**

First Request

The parties to this action, Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, "Plaintiffs") and Defendants LEPRO Innovation Inc., LE Innovation Inc, Innovation Rules Inc., Home Ever Inc., and Leitianlighting, Inc. (collectively, "Defendants") jointly stipulate and agree to an order to (1) set a deadline of **February 27, 2023**, for all Defendants to answer; (2) set aside entry of default as to defaulted defendants (ECF 22); and (3) withdraw

1 Plaintiffs' motion for leave to serve Defendant LE Innovation Inc., via the Nevada Secretary of State
2 (ECF 20). This is the first such request of the parties.

3 Counsel for Defendants have agreed to: (i) waive service on behalf of the Defendant LE
4 Innovation Inc., (ii) not to contest whether service is proper with respect to Defendants LEPRO
5 Innovation Inc., Innovation Rules Inc., Home Ever Inc., and Leitianlighting, Inc., and (iii) to
6 answer on behalf of all Defendants by **February 27, 2023**.

7 In consideration of a common answer deadline for **all** Defendants of February 27, 2023,
8 and Defendants' agreement on issues relating to service, Plaintiffs agree to set aside entry of
9 default as to Defendants LEPRO Innovation Inc., Innovation Rules Inc., Home Ever Inc., and
10 Leitianlighting, Inc. (ECF 22) and to withdraw Plaintiffs' Motion for Leave to Serve Nevada
11 Secretary of State in the Stead of Defendant LE Innovation Inc. (ECF 20).

12 The parties respectfully submit that good faith exists to grant the requested relief.
13 Defendants' newly retained counsel represents that Defendants, whose principals are from, and
14 apparently were in, China when this action was filed and service was performed did not actually
15 become aware of the lawsuit until around January 10, 2023, and then were further delayed in
16 seeking to obtain representation due to the Chinese New-Year holiday break. While Plaintiffs
17 contend that many of these delays were self-imposed as a result of Defendants' failure to
18 maintain registered agents as required under Nevada law, to avoid further delays, lengthy motion
19 practice, and "to secure the just, speedy, and inexpensive determination" of this action pursuant
20 to Rule 1 of the Federal Rules of Civil Procedure, Plaintiffs have agreed to this stipulation.

21 Plaintiffs, nevertheless, reserve their right to seek their costs, expenses, disbursements, and
22 reasonable attorneys' fees incurred as a result of Defendants' actions and omissions at the
23 conclusion of this action.

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WHEREFORE, the parties hereby stipulate to the entry of an order as follows:

(1) The deadline for all Defendants to file and serve their answer to the Complaint is **February 27, 2023**;

(2) The entry of default as to Defendants LEPRO Innovation Inc., Innovation Rules Inc., Home Ever Inc., and Leitianlighting, Inc. (ECF No. 22) is set aside; and

(3) Plaintiffs' Motion for Leave to Serve Nevada Secretary of State in the Stead of Defendant LE Innovation Inc. (ECF No. 20) is withdrawn.

Dated: February 15, 2023

Respectfully submitted,

/s/ F. Christopher Austin

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COUNSEL FOR PLAINTIFFS
Signify North America Corporation and
Signify Holding B.V.

Respectfully submitted,

/s/ Akke Levin

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COUNSEL FOR DEFENDANTS
LEPRO Innovation Inc.,
LE Innovation Inc.,
Innovation Rules Inc.,
Home Ever Inc., and
Leitianlighting, Inc.

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: February 16, 2023